

OFFICE OF THE CITY ATTORNEY  
ROBERT E. SHANNON, City Attorney  
333 West Ocean Boulevard, 11th Floor  
Long Beach, CA 90802-4664

ROBERT E. SHANNON, City Attorney  
HOWARD D. RUSSELL, Deputy City Attorney  
State Bar No. 163595  
333 West Ocean Boulevard, 11th Floor  
Long Beach, California 90802-4664  
Telephone: (562) 570-2200  
Facsimile: (562) 436-1579  
Email: howard.russell@longbeach.gov

Attorneys for Defendants  
CITY OF LONG BEACH  
SALVADOR ALATORRE  
ALVINO HERRERA  
GEORGE EVANS  
DAISY ORTIZ PAUL  
RODERICK TITH

LAW OFFICES OF DALE K. GALIPO  
Dale K. Galipo, Esq. SBN144074  
21800 Burbank Boulevard, Suite 310  
Woodland Hills, California 91367  
Telephone: (818) 347-3333  
Facsimile: (818) 347-4118

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

PERRY GRAYS, an individual,  
Plaintiff,

vs.

CITY OF LONG BEACH, SALVADOR  
ALATORRE, ALVINO HERRERA,  
GEORGE EVANS, DAISY ORTIZ,  
RODERICK TITH, and DOES 1-10,  
inclusive,

Defendant.

Case No.: CV11-07588 GAF (RZx)

Honorable Gary A. Feess, Judge  
Courtroom 740, Roybal

Honorable Ralph Zarefsky, Magistrate  
Judge

**PROTECTIVE ORDER  
STIPULATION**

Complaint Filed: September 14, 2011  
Trial Date: March 19, 2013

**WHEREAS**, Federal Rule of Civil Procedure 26(c)(1) provides that the court may, for good cause, issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense; and

**WHEREAS**, Plaintiffs' Request for Production of Documents – Set One request responses and documents that Defendants CITY OF LONG BEACH (hereinafter CITY) consider to constitute confidential and/or privileged official information including personnel complaints, investigative reports, personnel files, Internal Affairs interviews, and disciplinary records regarding the individual Defendant Officers, as well as, Long Beach Police Department training and instructional information and procedures, the following protective order shall apply to the names and addresses, and other information and/or documents, if any, ordered released by the Long Beach Police Department to the prosecution and defense in this action.

**IT IS HEREBY STIPULATED THAT:**

1. Attorneys for the parties shall receive from the Long Beach Police Department Custodian of Records copies of portions of the personnel files of defendant officers SALVADOR ALATORRE, ALVINO HERRERA, GEORGE EVANS, DAISY ORTIZ PAUL, RODERICK TITH, limited to Internal affairs complaints (summary and complainant/witness contact information), records of discipline and citizen complaints for each Defendant Officer as it pertains to complaints of excessive force, dishonesty, false arrests and false police reports for the ten year period before the incident.
2. Attorneys for the parties shall personally secure and maintain said copies in their possession to the end that said copies are to be used only for the purposes set forth below and for no other purpose.
3. Copies of the record shall only be used for preparing for and prosecuting or defending this case pending the completion of the judicial process including appeal, if any.

OFFICE OF THE CITY ATTORNEY  
ROBERT E. SHANNON, City Attorney  
333 West Ocean Boulevard, 11th Floor  
Long Beach, CA 90802-4664

4. Copies of the records may be used at time of trial only if so ordered by the court. Additionally, reference to the content of any records, or the existence of any such record shall only be made after so ordered by the Court.
5. If necessary in the judgment of the attorneys for the parties in this case, they may show or reveal the contents of the copies to their employees or agents, if the same may actively assist in the prosecution or defense of this case.
6. Plaintiff's attorneys may show or reveal contents of documents to their client, only in the event the documents describe or refer to incidents involving Plaintiff, unless otherwise ordered by the court
7. Any depositions, during which the contents of copies of the records are part of the testimony or copies of the records are attached as exhibits, shall be sealed as to any confidential portions.
8. After completion of the judicial process in this case, attorneys for the parties shall return the above-referenced records to the Office of the City Attorney as attorney for the Custodian of Records for the Long Beach Police Department and shall retain no copy of such material in any form.
9. Attorneys for the parties shall cause the substance of this Order to be communicated to each person to whom the information is revealed in accordance with this Order.
10. The attorneys for the parties shall not cause or knowingly permit disclosure of the contents of the copies beyond the disclosure permitted under the terms and conditions of this Order, including but not limited to any news media which is inclusive of film or video, television, radio or print.
11. This order may be signed in counterparts. A faxed signature shall serve with the same force and effect of an original signature.

OFFICE OF THE CITY ATTORNEY  
ROBERT E. SHANNON, City Attorney  
333 West Ocean Boulevard, 11th Floor  
Long Beach, CA 90802-4664

DATED: April 9, 2013

ROBERT E. SHANNON, City Attorney

By: /s/ Howard D. Russell

HOWARD D. RUSSELL  
Deputy City Attorney  
Attorneys for Defendants  
CITY OF LONG BEACH  
SALVADOR ALATORRE  
ALVINO HERRERA  
GEORGE EVANS  
DAISY ORTIZ PAUL  
RODERICK TITH

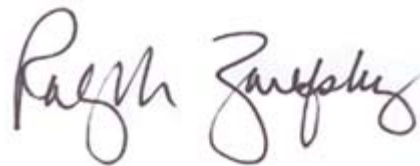
DATED: March 27, 2013

LAW OFFICES OF DALE K. GALIPO

/s/ Dale K. Galipo

By: \_\_\_\_\_  
DALE K. GALIPO, Esq.  
Attorneys for Plaintiff  
PERRY GRAYS

**IT IS SO STIPULATED ORDERED**



DATED: ~~March~~ April 9, 2013

\_\_\_\_\_  
Hon. Ralph Zarefsky, Magistrate Judge  
UNITED STATES DISTRICT COURT